

EXHIBIT 2

MOSER DECLARATION

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**DECLARATION OF JARED M. MOSER, ESQ. IN SUPPORT OF MOTION TO
COMPEL PRODUCTION AND FOR DISCOVERY SANCTIONS**

Jared M. Moser, Esq., declares, pursuant to 28 U.S.C. § 1746 and NRS § 53.045, under penalty of perjury, that the following is true and correct:

1. I am an Associate Attorney with the law firm of Marquis Aurbach Coffing (“MAC”), counsel for Defendant-Counterclaimant 3rd Generation Inc. dba California Auto Finance (“CAF”), and Defendant Carlos Navas (“Navas,” and together with CAF, “Defendants”), in this action styled *Gantchev v. 3rd Generation, Inc. et al.*, Consolidated Case Nos. 2:17-cv-00185-RFB-CWH and Case No. 2:17-cv-01692-JAD-PAL (the “Action”).

2. I am duly licensed to practice law in the State of Nevada, am over the age of 18 years, and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

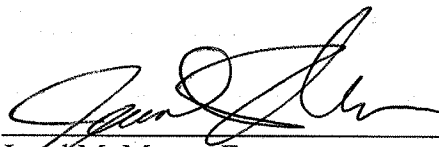
3. I make this Declaration in support of Defendants’ Motion for an Order Directing Experian Information Solutions, Inc. (“Experian”); Equifax, Inc.; and TransUnion to Produce Dispute Records (“Motion”).

4. I have litigated numerous cases involving allegations of violations of the Fair Debt Collection Practices Act and the Fair Credit Reporting Act (“FCRA”), and in doing so issued several subpoenas in 2017 to Experian to obtain plaintiff-consumer credit reports.

5. Experian responded to those subpoenas stating it could not provide the records absent an order from the Court, lest it be exposed to liability for violating the FCRA itself. A true, accurate, and authentic copy of one such letter we received from Experian, which is maintained in the ordinary course of MAC’s business, is attached to the Motion as **Exhibit 1**.

6. After a Court order was obtained and provided to Experian in those cases, Experian fully cooperated in producing the requested and relevant records.

Dated this 8th day of October, 2018.


Jared M. Moser, Esq.